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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF KRISTEN RENEE
FOURNIER IN SUPPORT OF
SUPPLEMENTAL ADMINISTRATIVE
MOTION TO SEAL**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Kristen Renee Fournier, declare as follows:

2 1. I am a partner at Kirkland & Ellis LLP, counsel of record for Defendants Uber
3 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”). I offer this Declaration in
4 the above-captioned matter in support of Uber’s Supplemental Administrative Motion to Seal Certain
5 Materials Attached to the Parties’ Motions to Exclude Experts.

6 2. Counsel for Plaintiffs do not oppose Uber’s proposed redactions.

7 3. Attached as **Exhibit R** is Uber’s Opposition to Plaintiffs’ Motion to Exclude Expert
8 Testimony with Uber’s proposed redactions.

9 4. Attached as **Exhibit S** is Ex. 2 to Uber’s Opposition to Plaintiffs’ Motion to Exclude Expert
10 Testimony (UBER-MDL3084-000067582) with Uber’s proposed redactions.

11 5. Attached as **Exhibit T** is Ex. 3 to Uber’s Opposition to Plaintiffs’ Motion to Exclude
12 Expert Testimony (UBER_JCCP_MDL_001102150) with Uber’s proposed redactions.

13 6. Attached as **Exhibit U** is Ex. 4 to Uber’s Opposition to Plaintiffs’ Motion to Exclude
14 Expert Testimony (Expert Report of David C. Sawyer) with Uber’s proposed redactions.¹

15 7. Attached as **Exhibit V** is Plaintiffs’ Opposition to Defendants’ Motions to Exclude Expert
16 Testimony with Uber’s proposed redactions.

17 8. Attached as **Exhibit W** is Ex. 3 to Plaintiffs’ Opposition to Defendants’ Motions to
18 Exclude Expert Testimony (Addendum to Report of Veronique Valliere) with Uber’s proposed redactions.

19 I declare under penalty of perjury under the laws of the United States of America that the foregoing
20 is true and correct.

21 Dated: December 15, 2025

22 /s/ Kristen Renee Fournier
23 KRISTEN RENEE FOURNIER

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27 ¹ In order to simplify the redaction process, Uber is providing, for placement on the public docket, a
28 redacted version of the Sawyer Report that omits the discussion of the non-Dean bellwether drivers
(pp. 57-67 of the report), since that discussion is not relevant to the current *Dean*-related proceedings.